

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE)

-and-)

EARTH INTELLIGENCE NETWORK)

Plaintiffs,)

v.)

Case No. 3:17-cv-601-MHL

JASON GOODMAN)

PATRICIA A. NEGRON)

-and-)

QUEEN TUT, A Woman Believed To Be)

Known As Carla A. Howell)

Defendants.)

MEMORANDUM IN SUPPORT OF
MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT

Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, pursuant to Local Civil Rule 7(F), respectfully submit this Memorandum in Support of their Motion for Leave to File Amended Complaint:

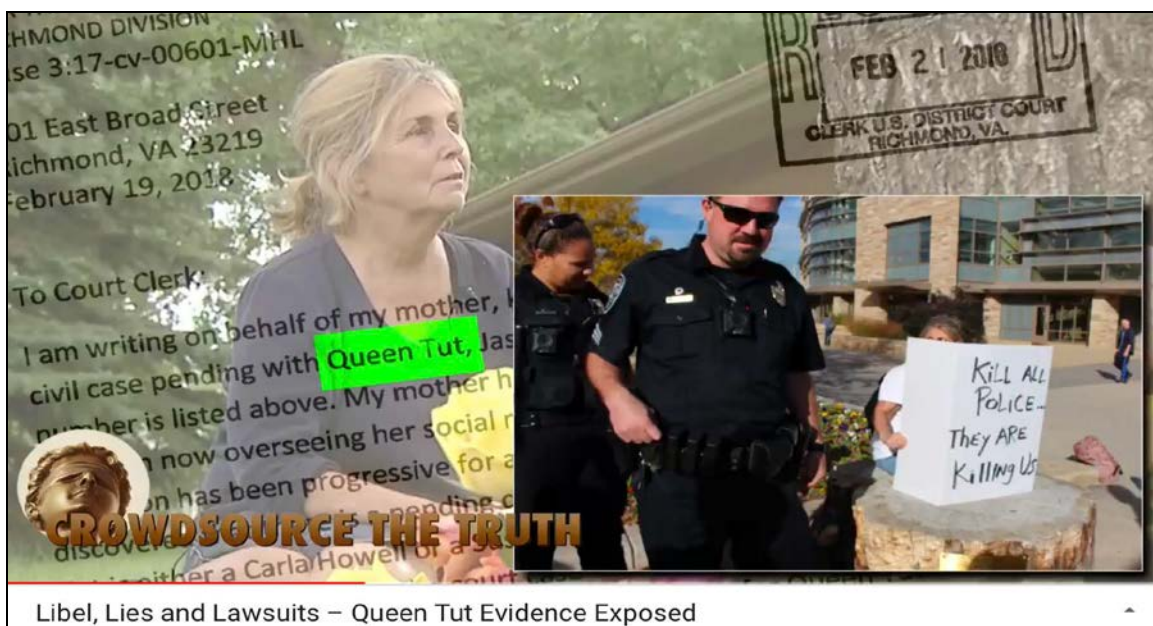
1. On September 1, 2017, Plaintiffs commenced this action by filing a Complaint. In their Complaint, Plaintiffs stated claims of defamation *per se*, insulting words, business conspiracy, common-law conspiracy and tortious interference. Plaintiff's claims arose out of conduct that occurred prior to September 1, 2017.

2. Since September 1, 2017, Defendants' defamation campaign has continued. In fact, it has gotten much, much worse.

3. After Plaintiffs filed this action, they learned definitively, through additional research and admissions by Defendant, Goodman, that "Queen Tut" is an individual from Fort Collins, Colorado, named Susan A. Lutzke ("Lutzke").

4. Irrefutable proof of "Queen Tut's" identity was submitted to the Court by Plaintiffs in response to letters that the Court received [*Documents 31 and 33*] from a person who identified herself as "Queen Tut's" daughter. The letters falsely represent that "Queen Tut" is an 80-year old woman born in New York who suffers from "dementia".

5. Document 34, filed by Plaintiffs, establishes beyond cavil and any doubt that Susan Lutzke is "Queen Tut". On March 17, 2018, Goodman published another video on YouTube in which he positively identifies Susan Lutzke as "Queen Tut". [<https://www.youtube.com/watch?v=1koAEHYbZTA> ("Libel, Lies and Lawsuits – Queen Tut Evidence Exposed")]. The video begins with the following screenshot:



6. Plaintiffs' served Lutzke and, thereafter, filed a Motion for Entry of Default after Lutzke failed to respond. [*Document 30*].

7. On March 9, 2018, the Court denied Plaintiffs' Motion for Entry of Default without prejudice. The Court found that Plaintiffs' Complaint did not name Lutzke as a Defendant, and, therefore, the entry of default against her was not appropriate.

8. In the interests of justice and judicial economy, Plaintiffs request leave to file an Amended Complaint naming Lutzke as a Defendant and seeking relief for the cumulative defamation and other wrongdoing perpetrated by these Defendants to date.

9. Lutzke's joinder as a party-defendant is proper and it will not defeat subject matter jurisdiction.

10. The Court has not yet entered its Order Setting Pretrial Conference. Discovery has not started. Therefore, granting Plaintiffs' Motion and allowing Plaintiffs to file an Amended Complaint, will not interfere with any established deadlines or otherwise affect the administration of this action.

11. No party would be prejudiced by the relief requested in Plaintiffs' Motion for Leave to File an Amended Complaint.

12. On March 9, 2018, counsel for Plaintiffs emailed counsel for Defendant, Negron, and Defendant, Goodman, to inquire whether the Defendants would consent to the relief requested by Plaintiffs in the Motion. Counsel received no response to his email.

Accordingly, for the reasons stated, Plaintiffs respectfully request leave to file and serve their proposed Amended Complaint.

DATED: March 25, 2018

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

By: /s/ Steven S. Biss
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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2018 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendant, Goodman, and to Susan A. Lutzke

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